

**Response to Office Action for
Application No: 09/497,773**

REMARKS

With respect to paragraphs 1-2 of the Office Action, Applicants respectfully disagree with the rejection of claims 1-15 based on U.S. Patent No. 6,247,047 (“Wolff”) in view of U.S. Patent No. 6,138,158 issued to Boyle et al. (“Boyle”).

The Wolff reference describes a unique database record identifier that is embedded within an advertising banner. The unique database record identifier is used by a separate host site (i.e. the site provided by a separate host server 12), to search and retrieve a specific database record from a product database stored at the separate host server 12. The Wolff reference does not teach or suggest a website name with a second word that is product related. In contrast, the product offered for sale as described by Wolff is offered via a separate host server 12 and is not offered for sale by the site visited by the user, i.e. the advertising/sponsor site hosted by server 50. In addition, Wolff discloses a unique database record identifier, not a product name that identifies the product offered. Thus, Applicants agree with the Examiner that the Wolff reference does not specify that a second word in the domain name is product related.

The Boyle reference discloses a system to keep mobile device subscribers informed of updates to desired information using narrowband and wideband channels. (See Boyle Abstract). As further explained in Boyle, “When one or more pages of information are updated, users of those client devices subscribing to the updated pages of information receive a notification from one of the server devices that stores the updated information.” Boyle, Summary of the Invention, Col. 2, Lines 16-20.

The Boyle reference further describes a table maintained in a web server including a list of wireless device subscriber IDs 502 for those select subscribers that desire to be informed of any changes to particular web pages. The list of these particular web pages where mobile subscriber updates are provided is presented by a list of pages identifying URLs, such as:

news (www.xyzAlert.com/news/abc.com),

stock quotes (www.xyzAlert.com/stock/abc), and

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weather (www.xyzAlert.com/weather/townA), etc.

Boyle, Col. 9, Lines 49-67.

The URLs representing the information subscribed to by the mobile device users are grouped and maintained in a URL table 506. The URL table 506 maintains a plurality of groups of URLs, each group corresponding to one subscriber mobile device and comprising a list of URLs representing information subscribed by a user thereof. When the information service provider at the Web server updates information in certain pages, for example a press release from ABC Company is loaded into News (at www.xyzAlert.com/new/abc.com), a notification to the subscribers listed in the table 502 are notified of the new update. Boyle, Col. 10, Lines 1-27.

With respect to the Boyle reference, the Examiner has stated that Boyle teaches a means for labeling URLs using descriptive words in combination with an arbitrary base word in order to provide a more organized and easier to understand network of URLs. Page 3 of the Office Action. Applicants respectfully disagree with this statement. The URLs identified in FIG. 5 of the Boyle reference are shown as examples of existing URLs associated with website page names for specific website pages where updates to those pages can result in a page update notification sent to a list of wireless device subscribers. The URLs are not labeled using descriptive words in order to provide for a more organized and easier to understand network of URLs. Rather, the URL table 506 is a list of selected website pages that are monitored for updates to be provided to certain listed mobile subscribers identified by Subscriber IDs 502.

The Examiner further stated that “Based on the teaching of Boyle et al., it would have been obvious to one of ordinary skill in the art, at the time the invention was made, to modify unique numerical indicia of Wolff to incorporate the descriptive words of Boyle et al. in order to provide a more organized and easier to understand network of URLs.” Page 4 of the Office Action.

Applicants respectfully disagree. First, as explained above, the Examiner has not shown where the Boyle reference provides a teaching of a more organized and easier to

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understand network of URLs. Thus, the Examiner's specifically identified teaching to combine the Boyle reference with the Wolff reference has not been supported.

Further, changing the unique numerical identifier of Wolff to incorporate descriptive words of Boyle, as suggested by the Examiner, is not taught or suggested by the prior art and would cause technical problems in the Wolff system. The unique numerical identifier of Wolff is passed from a banner advertisement sponsor server 50 to the host server 12. In addition, the unique numerical identifier in Wolff is normally not even shown to the user. Wolff, Col. 7, Lines 33-34. At the host server 12, the received unique numerical identifier is used to retrieve a record from a database after performing a database search operation using the unique numerical identifier. Since the unique numerical identifier is used as a database retrieval index to perform a database search operation, changing the unique numerical identifier to a descriptive product name would require a more complex database search. In addition, since the database search of Wolff requires use of a unique search index, extra effort and logic (and resulting costs) would be needed to ensure that the product descriptive terms were unique and searchable (e.g. with the correct database record search format and not including un-searchable characters). This extra effort and associated cost involved with the change from the numerical identifier to product descriptive text would not be perceived as adding value to the Wolff system since the unique numerical identifier is normally not shown to the user.

Thus, there is no motivation, teaching, or suggestion to combine the unique numerical identifier of Wolff with the descriptive update service names shown in Boyle. Further, the combination of the two references would be technically undesirable due to the increased database searching complexity of using a descriptive word index instead of the unique numerical index. Thus, the combination of the Wolff reference with the Boyle reference is not appropriate.

Thus, for at least the foregoing reasons, Applicants respectfully request the Examiner to remove the pending rejection based on Wolff and Boyle

Applicants have added new claims 16-23. Applicants submit that each of the new claims is supported by the specification and is in condition for allowance.

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None of the cited references teach the specific combination as recited in claim 16. For example, none of the cited references teach a method of offering a plurality of interrelated products through a plurality of interrelated websites including the method steps of establishing a first website having a first website domain name, the first website domain name including a common name portion and a first product name portion, where the first product name portion identifies a first product of the plurality of interrelated products offered for sale via the first website.

Further, none of the cited references teach or suggest establishing a second website having a second website domain name, where the second website domain name includes the common name portion and a second product name portion, and where the second product name portion identifies a second product of the plurality of interrelated products offered for sale via the second website. In addition, none of the cited references teach that the second product offered via the second site is related to the first product offered via the first site. In contrast to claim 16, Wolff teaches a single host site 12 that describes products within a product database.

Further, none of the cited references teach creating a website direct link between the first website (having a first product name and offering a first product) and the second website (having a second product name and offering a second product). The Wolff reference describes providing links between the sponsor site and the host server 12, but not between different product offering sites where each product offering site has a product identifying name portion within the respective website domain name. For at least the foregoing reasons, claim 16 is in condition for allowance.

None of the cited references teach the specific combination as recited in claim 19. For example, none of the cited references teach a method of offering a plurality of interrelated products through a plurality of interrelated websites including the method steps of establishing a first website having a first website domain name, the first website domain name including a common name portion and a first product name portion, where the first product name portion identifies a first product of the plurality of interrelated products offered for sale via the first website.

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Further, none of the cited references teach or suggest establishing a second website having a second website domain name, where the second website domain name includes the common name portion and a second product name portion, and where the second product name portion identifies a second product of the plurality of interrelated products offered for sale via the second website. In addition, none of the cited references teach that the second product offered via the second site is related to the first product offered via the first site. In contrast to claim 19, Wolff teaches a single host site 12 that provides information regarding products by searching a product database.

Further, none of the cited references disclose establishing a third website having a third website domain name, the third website domain name including the common name portion and a third product name portion, where the third product name portion describes a third product of the plurality of interrelated products offered for sale via the third website. Further, the cited references fail to disclose that the third product is related to the first product and is related to the second product, and that the third website is separately accessible via the electronic communications network.

Further, none of the cited references teach that the first website includes a first direct link to the second website and includes a second direct link to the third website, the second website includes a third direct link to the first website and a fourth direct link to the third website, and the third website includes a fifth direct link to the first website and a sixth direct link to the second website. Thus, claim 19 is allowable over the cited references.

None of the cited references teach the specific combination as recited in claim 23. For example, none of the cited references teach a method of offering a plurality of interrelated services through a plurality of interrelated websites including the method steps of establishing a first website having a first website domain name, the first website domain name including a common name portion and a first service name portion, where the first service name portion identifies a first service of the plurality of interrelated services identified via the first website.

Further, none of the cited references teach or suggest establishing a second website having a second website domain name, where the second website domain name includes the

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common name portion and a second service name portion, and where the second service name portion identifies a second service of the plurality of interrelated services identified via the second website. In addition, none of the cited references teach that the second service offered via the second site is related to the first service offered via the first site. In contrast to claim 23, Wolff teaches a single host server 12 that provides information regarding products by searching a product database.

Further, none of the cited references disclose establishing a third website having a third website domain name, the third website domain name including the common name portion and a third service name portion, where the third service name portion describes a third service of the plurality of interrelated services identified via the third website. Further, the cited references fail to disclose that the third service is related to the first service and is related to the second service, and that the third website is separately accessible via the electronic communications network.

Further, none of the cited references teach that the first website includes a first direct link to the second website and includes a second direct link to the third website, the second website includes a third direct link to the first website and a fourth direct link to the third website, and the third website includes a fifth direct link to the first website and a sixth direct link to the second website. Thus, claim 23 is also allowable over the cited references.

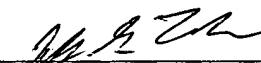
For at least the foregoing reasons, each of the pending claims 1-23 are submitted to be in condition for allowance, and reexamination of the pending application is respectfully requested.

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In conclusion, Applicants have overcome all of the Office's rejections, and early notice of allowance to this effect is earnestly solicited. If, for any reason, the Office is unable to allow the Application on the next Office Action, and believes a telephone interview would be helpful, the Examiner is respectfully requested to contact the undersigned attorney.

Respectfully submitted,

12-30-2002
Date


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